

RECEIVED

UNITED STATES DISTRICT COURT JAN 20 PM 4:27
WESTERN DISTRICT OF TENNESSEE

☐ Eastern (Jackson) DIVISION

☒ Western (Memphis) DIVISION

you * JAMES DEWAYNE GRIFFIN

Plaintiff,

vs.

* Delta Technical College
* * Atty. Bruce Thieman
* Charles "Frankie" Ryals
* Ralph Fitzgerald
Defendant.

No. _____

COMPLAINT

1. This action is brought for discrimination in employment pursuant to (check only those that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

NOTE: In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 – 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102 -166)

NOTE: In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 – 12117 (amended by the ADA Amendments Acts of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 1102-166).

NOTE: In order to bring a suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.

2
JPGJURISDICTION

2. Jurisdiction is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, and any related claims under Tennessee law.

Current Address 8.2 MAILING: → 4532 PARTIES
3. Plaintiff resides at: 4532 Cottonwood Road
Memphis, TN 38118
PERMANENT: 3511 Seven Road STREET ADDRESS
Batesville, MS 38606 Zip Code (901)-628-8805 Telephone Number
County: Panola State

4. Defendant(s) resides at, or its business is located at:

301 SW Adams, Suite-700
STREET ADDRESS

Peoria, IL 61602
County City State Zip Code
Phone # (309)-676-1381

NOTE: If more than one defendant, you must list the names, address of each additional defendant.

② Charles & Frankie Ryals, 434 Nesbit Rd., Nesbit, MS 38651
Phone # (901)-268-6274

③ Ralph Fitzgerald, 6550 D Interstate Blvd,
Moran Lake, MS 38637

EMPLOYED The address at which I sought employment or was employed by the defendant(s) is:
Delta Technical College 4711 E. Holmes Rd. Memphis, TN 38118 EMPLOYER

3
gdy

STREET ADDRESS

 County City State Zip Code

6. The discriminatory conduct of which I complain in this action includes (*check only those that apply*)

☐

Failure to hire

☒

Termination of my employment

☒

Failure to promote

☐

Failure to accommodate my disability

☒

Unequal terms and conditions of my employment

☒

Retaliation

☒Other acts(*specify*): RACE, SEX, COLOR

NOTE: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

7. It is my best recollection that the alleged discriminatory acts occurred on:

 Date(s)

8. I believe that the defendant(s) (*check one*):

By Employment Referral After References

☒

is still committing these acts against me.

BOTH

☒is not still committing these acts against me.

I'm not employment anymore

9. Defendant(s) discriminated against me based on my:
 (*check only those that apply and state the basis for the discrimination. For example, if religious discrimination is alleged, state your religion. If racial discrimination is alleged, state your race, etc.*)

- ☒ Race BLACK / AFRICAN - American
- ☒ Color BROWN - DARK SKINNED
- ☒ Gender/Sex MALE
- ☐ Religion _____
- ☐ National Origin _____
- ☐ Disability _____
- ☐ Age. If age is checked, answer the following:
I was born in _____. At the time(s) defendant(s) discriminated against me.
- I was [] more [] less than 40 years old. (check one)

NOTE: Only those grounds raised in the charge filed the Equal Employment Opportunity Commission can be considered by the federal district court.

10. The facts of my case are as follows:

Wrongful Termination, Retaliation, RACE, SEX
ASSIST WITH My Right To Suit Letter
Written Documentation
Humiliate, Intimidate, and disrespect, Fabricate
facts, Federal Motor Safety Violation asking me to
perform/DO.
WORK with flat tire on tractor-trailer, Clean Restroom,
Cut grass (I'm allergic to grass - stated day one)
 (Attach additional sheets as necessary)

NOTE: As additional support for your claim, you may attach to this complaint a copy of the

5
2292

charge filed with the Equal Employment Opportunity Commission or the Tennessee Human Rights Commission.

11. It is my best recollection that I filed a charge with the Tennessee Human Rights Commission regarding defendant's alleged discriminatory conduct on: _____

12. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: Nov 8, 13 - Aug. 2014
Date

Only litigants alleging age discrimination must answer Question #13.

13. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct. (check one):

☐ 60 days or more have elapsed

☐ Less than 60 days have elapsed.

14. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Right to Sue Letter.

☒ has issued a Right to Sue letter, which I received on Nov. 5, 2016 ← OCT 25, 2016 ← DATED LETTER
Date

NOTE: This is the date you received the Right to Sue letter, not the date the Equal Employment Opportunity Commission issued the Right to Sue letter.

15. Attach a copy of the Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.

NOTE: You must attach a copy of the right to sue letter from the Equal Employment Opportunity Commission.

16. I would like to have my case tried by a jury:

☒ Yes
☐ No

6922

WHEREFORE, plaintiff prays that the Court grant the following relief:

☐ direct that the Defendant employ Plaintiff, or

☒ direct that Defendant re-employ Plaintiff, or

☐ direct that Defendant promote Plaintiff, or

☒ order other equitable or injunctive relief as follows: Leave Open
FOR LATER

☒ direct that Defendant pay Plaintiff back pay in the amount of \$120,000.00
and interest on back pay;

☒ My RATE Each Year = \$40,000 @ 2013, 2014, 2015,
direct that Defendant pay Plaintiff compensatory damages: Specify the 2016,
amount and basis for compensatory damages: _____

\$113,000.00

X James Delwayne Huff
SIGNATURE OF PLAINTIFF

X Date: Jan 19, 2016 (THURSDAY)

X P.O. Box 301231
Address

Memphis, TN 38130

X 901-628-8805
Phone Number